

**STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION
DOCKET NO. 2021-88-E**

IN RE:)	SOUTH CAROLINA DEPARTMENT
)	OF CONSUMER AFFAIRS' FIRST SET
Dominion Energy South Carolina, Inc.'s)	OF INTERROGATORIES AND
2021 Avoided Cost Proceeding Pursuant to)	REQUEST FOR PRODUCTION TO
S.C. Code Ann. Section 58-41-20(A))	SOUTH CAROLINA COASTAL
<hr/>)	CONSERVATION LEAGUE ("CCL")
		AND THE SOUTHERN ALLIANCE
		FOR CLEAN ENERGY ("SACE").

Pursuant to S.C. Code Ann. Regs. 103-833, the South Carolina Department of Consumer Affairs (the "Department"), by and through its undersigned counsel, hereby submits this First Set of Interrogatories and Request for Production to South Carolina Coastal Conservation League ("CCL") and the Southern Alliance for Clean Energy ("SACE"). Pursuant to South Carolina Rule of Civil Procedure 26(e) and Commission regulations, each request is continuing until the time of the hearing such that the Company must promptly transmit to the Department the requested information as it becomes available.

INSTRUCTIONS

1. Responses to these requests should be provided to the undersigned, via email, within twenty (20) days of the date of service.
2. All information should be provided to the undersigned in the format requested and under oath.
3. All responses to the below requests should be labeled using the same numbers as used herein.
4. If the requested information is found in other places or in other exhibits, reference shall not be made to those, but instead, the information should be reproduced and placed in the responses to this request in the appropriate sequence.
5. All documents shall be provided in their native format, e.g., in Word, Excel, or PowerPoint format with all functions, data, and formulas intact.
6. Each request should be reproduced at the beginning of the response thereto.
7. If the response to any Request for Production of Documents is that the information requested is not currently available, please state when the information requested will become available.
8. This request shall be deemed continuing so as to require SACE and CCL to supplement or amend its responses as any additional information becomes available up to and through the date of hearing.

9. For any document withheld under a claim of privilege, submit a sworn or certified statement from your counsel or one of your employees in which you identify the document by author, addressee, date, number of pages, and subject matter; specify the nature and basis of the claimed privilege and the paragraph of this demand for documents to which the document is responsive; and identify each person to whom the document or its contents, or any part thereof, has been disclosed.
10. If a refusal to respond to a Request for Production of Documents is based on the grounds that same would be unduly burdensome, identify the number and nature of documents needed to be searched, the location of the documents, and the number of hours and costs required to conduct the search.
11. Answer each request on the basis of the entire knowledge of SACE and CCL, including information in the possession of SACE and CCL or its consultants, representatives, agents, experts, operating divisions, business divisions, assigns, partners, and attorneys, if any.
12. If any request cannot be answered in full, respond to the extent possible and specify the reasons for SACE's and CCL's inability to respond.

DEFINITIONS

As used herein, the following terms shall have the meaning and be interpreted as set forth below:

1. "You," "your," mean SACE and CCL or any of its affiliates, officers, directors, employees, attorneys, or agents.
2. "Application" is defined as the application filed by Dominion Energy South Carolina, Inc. on April 22, 2021 or as otherwise revised.
3. "CCL" and "SACE" are defined as "South Carolina Coastal Conservation League," and the "Southern Alliance for Clean Energy," respectively, their parent(s), subsidiaries, affiliates, predecessors, successors, officers, directors, agents, employees, and other persons acting in its behalf.
4. "Workpapers" and "documents" are defined in the broadest terms and should not be construed as limited to the listed examples, or limited only to items that are currently within your control or custody; include each and every original or copy of words or information generated by printing, typing, longhand, electronic recording, or other process, regardless of the form thereof, and include any kind of writing. Such documents include, but are not limited to, published materials, reports, correspondence, emails, records, memoranda, notices, notes, marginal notations, messages, teletype printouts, statements, books, studies, minutes, diagrams, drawings, maps, surveys, plans, charts, graphs, data, computer files, billings, evaluations, photographs, audio tapes, and videotapes. The terms include drafts, revisions or amendments of any of the above, and generally, any kind of tangible, permanent records that are now, or formerly were, in your possession, custody or control, or that were known by you to exist, and that can be located or discovered by reasonably diligent efforts.
5. "Communication(s)" when used in these Requests shall include the transmittal of information by any means, written, oral, electronic or otherwise.

6. When used in referenced to a document, "identify," identity," and "identification" mean to state the type of document (e.g., computer-stored information, microfilm, letter, memorandum, policy circular, minute book, telegram, chart, etc.), or some other means of identifying it, and its present location and custodian. If any such document was, but no long is, in your possession or subject to your control, state what disposition was made of the document, and if the document was destroyed or disposed of pursuant to a retention policy, please state the retention policy.

DOCUMENT AND INFORMATION REQUESTS

- 1-1 Provide all workpapers and source documents supporting the direct testimonies and exhibits of Kenneth Sercy. Please provide the requested documents in electronic form with all spreadsheet links and formulas intact. Include the source data and explain all assumptions and calculations used. To the extent the data requested is not available in the form requested, provide the information in the form that most closely matches what has been requested.
- 1-2 Provide copies of responses to all questions or information requests submitted to the Southern Alliance for Clean Energy and the South Carolina Coastal Conservation League by other parties.
- 1-3 Please provide all workpapers and source documents supporting Figure 1 included in the Direct Testimony of Kenneth Sercy at pages 8 and 9. Please provide the requested documents in electronic form with all spreadsheet links and formulas intact. Include the source data and explain all assumptions and calculations used. To the extent the data requested is not available in the form requested, provide the information in the form that most closely matches what has been requested.
- 1-4 Regarding Exhibit KS-3 to Direct Testimony of Kenneth Sercy:
 - a. Does SACE/CCL believe that an analysis of expected hourly marginal system costs is not an appropriate method to designate appropriate pricing periods?
 - b. Does SACE/CCL agree that Exhibit KS-3 generally shows that the utility has high marginal system costs during the hours of 6:00 a.m. and 9:00 a.m. in the winter months of November through March?
 - c. Does SACE/CCL agree that Exhibit KS-3 generally shows that the utility has high marginal system costs during the hours of 5:00 p.m. and 10:00 p.m. in the summer months of June through August?
 - d. To the extent the SACE/CCL responses to either (b) or (c) are in the negative, please provide SACE/CCL's alternative understanding of high marginal system costs provided by Exhibit KS-3.

- e. Please provide the any supporting documents in electronic form with all spreadsheet links and formulas intact. Include the source data and explain all assumptions and calculations used. To the extent the data requested is not available in the form requested, provide the information in the form that most closely matches what has been requested.

- 1-5 For the purposes of this request, please refer to the Direct Testimony of Kenneth Sercy at page 15 where he argues for hourly avoided energy QF rates for all technology types.
 - a. Has SACE/CCL estimated the average annual compensation for a QF solar provider under DESC's proposed flat avoided energy cost rate for solar generation systems and the proposed hourly avoided energy cost rate for non-solar generation systems?
 - b. To the extent SACE/CCL's response to (a) above is in the affirmative, please provide a copy of all analyses prepared by the party that assesses the potential impact of hourly avoided energy QF rates for all technology types.
 - c. Please provide the requested documents in electronic form with all spreadsheet links and formulas intact. Include the source data and explain all assumptions and calculations used. To the extent the data requested is not available in the form requested, provide the information in the form that most closely matches what has been requested.

- 1-6 Please provide all workpapers and source documents supporting Figure 2 included in the Direct Testimony of Kenneth Sercy at page 26. Please provide the requested documents in electronic form with all spreadsheet links and formulas intact. Include the source data and explain all assumptions and calculations used. To the extent the data requested is not available in the form requested, provide the information in the form that most closely matches what has been requested.

- 1-7 Please provide all workpapers and source documents supporting Figure 3 included in the Direct Testimony of Kenneth Sercy at page 29. Please provide the requested documents in electronic form with all spreadsheet links and formulas intact. Include the source data and explain all assumptions and calculations used. To the extent the data requested is not available in the form requested, provide the information in the form that most closely matches what has been requested.

****signature and certificate of service on following page****

Respectfully submitted this 2nd day of August 2021,

S.C. DEPARTMENT OF CONSUMER AFFAIRS



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CERTIFICATE OF SERVICE

I, Roger Hall, hereby certify that the foregoing document was served by electronic mail on all parties at the addresses listed in the official service list for Docket 2021-88-E on August 2, 2021



Roger Hall, Esq.